

# PARNESS LAW FIRM, PLLC

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United States District Judge Analisa Torres  
United States District Court for the  
Southern District of New York  
500 Pearl Street, Courtroom 15D  
New York, New York 10007

Re: Hall & Price v. Protoons Inc., 1:21-cv-02043-AT-KHP (S.D.N.Y.)

Dear Judge Torres:

We represent Defendant Protoons Inc. in the above-referenced action. The Court has set May 16, 2022, as the date by which the parties should file any pre-motion letters in support of dispositive motions. Your Honor adjourned this date twice before, to allow the parties additional time to engage in ongoing settlement discussions. ECF 61, 66.

I am writing at this time, jointly on behalf of Defendant and the Plaintiffs, to request a further six-week adjournment of the date for the submission of pre-motion letters, until June 27, 2022. The reason for this adjournment, as with the prior adjournments, is to allow additional time to explore a potential global resolution of this matter with a third party, which efforts continue to advance, but which require more time. At this point, the parties have spoken with said third party, but are waiting to hear back from that party with a formal proposal.

In my previous letter (ECF 64) I indicated that the parties had agreed at that time not to seek any further adjournments of this submission deadline, but in view of the foregoing, we respectfully request the Court's consideration in granting this additional adjournment to allow the settlement process sufficient time to play out.

The parties are scheduled to appear before Magistrate Parker on July 18, 2022 for a Settlement Conference, and do not seek to adjourn that date.

Respectfully submitted,



Hillel I. Parness

GRANTED.

SO ORDERED.

Dated: May 13, 2022  
New York, New York



ANALISA TORRES  
United States District Judge